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September 21, 2010

**VIA ECF & FACSIMILE**

Honorable Claire C. Cecchi, U.S.M.J.  
United States District Court  
Martin Luther King, Jr. Federal Building  
and United States Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *Panasonic Corporation v. Freescale Semiconductor, Inc.*  
Civil Action No. 10-1668 (JLL) (CCC) (D.N.J.)

Dear Judge Cecchi:

On behalf of defendant, Freescale Semiconductor, Inc. ("Freescale"), we are writing to request additional time to serve Freescale's Invalidity Contentions and document production pursuant to L. Pat. R. 3.3 and 3.4 in view of the assertion by plaintiff, Panasonic Corporation ("Panasonic"), of 90 patent claims. Pursuant to paragraph 3 of the Court's July 23, 2010 Pretrial Scheduling Order (the "7/23/10 Order"), Freescale's L. Pat. R. 3.3 and 3.4 disclosures are currently due on October 8, 2010. Freescale respectfully requests an extension until November 8, 2010, to prepare and serve such disclosures.

Panasonic consents to the requested extension. If the Court grants the extension, two other modifications to the 7/23/10 Order will become necessary. First, paragraph 4 of the Order requires the parties to exchange a list of claim terms that each contends should be construed by the Court and thereafter meet and confer for the purpose of limiting the terms in dispute pursuant to L. Pat. R. 4.1 by October 22, 2010. The parties have agreed to extend this deadline until November 15, 2010, if the Court so permits.

Second, paragraph 7 of the 7/23/10 Order schedules a telephonic status conference for November 3, 2010. The parties respectfully request that the status conference be adjourned until after the November 15, 2010 deadline for exchanging proposed claim terms for construction pursuant L. Pat. R. 4.1. We understand from Your Honor's Chambers that the Court has time available on November 19, 2010 at noon, for the telephonic status conference. The parties are also available then, and therefore respectfully request that the conference be reset to November 19, 2010 at noon.



**DECOTIIS**

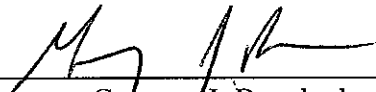
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If the Court would like to discuss this matter with counsel, we are available for a conference call at the Court's convenience. A proposed order is attached hereto.

Respectfully submitted,

**DeCOTIIS, FITZPATRICK & COLE, LLP**

By:   
Gregory J. Bevelock

GJB

Enc.

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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PANASONIC CORPORATION,

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.,

Defendant.

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Civil Action No. 2:10-cv-01668  
(JLL)(CCC)

**ORDER AMENDING THE JULY 23, 2010  
PRETRIAL SCHEDULING ORDER**

**THIS MATTER** having come before the Court on the application by defendant, Freescale Semiconductor, Inc. ("Defendant"), by and through its attorneys, DeCotiis, FitzPatrick & Cole, LLP, and Jones Day, for an extension of time within which to serve its Invalidity Contentions and document production pursuant to L. Pat. R. 3.3 and 3.4; and plaintiff, Panasonic Corporation, by and through its attorneys, Gibbons P.C. and White & Case LLP, having consented to the extension and the entry of this form of Order; and the Court having considered the application; and for good cause shown;

**IT IS** on this \_\_\_\_ day of September, 2010,

**ORDERED** that paragraphs 3, 4 and 7 of the July 23, 2010 Pretrial Scheduling Order are hereby amended to provide as follows:

3. By November 8, 2010, Defendant shall provide to Plaintiff its Invalidity Contentions and document production as required under L. Pat. R. 3.3 and 3.4.

4. By November 15, 2010, the parties shall exchange a list of claim terms that each contends should be construed by the Court, and the parties shall thereafter meet and confer for the purpose of limiting the terms in dispute pursuant to L. Pat. R. 4.1.

7. There shall be a telephone status conference before the Undersigned on November 19, 2010 at 12:00 PM. Plaintiff shall initiate the telephone call.

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HON. CLAIRE C. CECCHI, U.S.M.J.